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7	KOLESAR & LEATHAM 400 S. Rampart Blvd., Suite 400		
8	Las Vegas, NV 89145 Tel: 702.362.7800 Fax: 702.362.9472  Attorneys for Defendants TRINITY FINANCIAL SERVICES, LLC and		
9			
10			
11	TRINITY RECOVERY SERVICES, LLC		
12	UNITED STATES DISTRICT COURT		
13	DISTRICT OF NEVADA		
14			
15	RODNEY MOTT,	Case No. 2:17-cv-01754-RFB-GWF	
16	Plaintiff,	STIPULATION FOR EXTENSION OF	
17	v.	TIME TO RESPOND TO PLAINTIFF'S MOTION FOR TERMINATING	
18	TRINITY FINANCIAL SERVICES, LLC, AND TRINITY RECOVERY SERVICES,	SANCTIONS AND MOTION FOR PARTIAL SUMMARY JUDGMENT; ORDER [PROPOSED] THEREON	
19	LLC,	(FIRST REQUEST)	
20	Defendants.	(FIRST REQUEST)	
21			
22	On August 10, 2018, plaintiff Podnov	Mott ("Dlaintiff") filed a motion for terminating	
23	On August 10, 2018, plaintiff Rodney Mott ("Plaintiff") filed a motion for terminating		
24	sanctions and a motion for partial summary judgment. Currently, defendants Trinity Financial  Services, LLC and Trinity Passayery Services, LLC (collectively, "Defendants") must respond to		
25	Services, LLC and Trinity Recovery Services, LLC (collectively, "Defendants") must respond to		
26	Plaintiff's motion for terminating sanctions on or before August 24, 2018 and to Plaintiff's		
27	motion for partial summary judgment on or before August 31, 2018.		
28	Pursuant to LR 6-1 and LR 7-2, Plaintiff and Defendants, by and through their respective		
AMS & LLP		- 1 - STIPULATION FOR EXTENSION OF TIME	
LAW	LA #4820-8068-6192 v1	TO RESPOND	

BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW SANTA ANA

1	counsel of record, hereby stipulate and request that this Court (1) extend to and including		
2	September 7, 2018 the time by which Defendants must respond to Plaintiff's motion for		
3	terminating sanctions and (2) extend to and including September 14, 2018 the time by which		
4	Defendants must respond to Plaintiff's motion for partial summary judgment.		
5	There is good cause for the requested extension. The parties are discussing a potential		
6	settlement of this matter and believe that it would be in the interest of justice and more efficient to		
7	devote their time during the upcoming weeks on efforts to settle this matter rather than expending		
8	time and money preparing responses and replies to the pending motions.		
9	IT IS SO STIPULATED.		
10	Dated August 17, 2018		
11	/s/ Miles N. Clark	/s/ Michael R. Brooks	
11	Matthew I. Knepper, Esq.	Michael R. Brooks, Esq.	
12	Nevada Bar No. 12796	Nevada Bar No. 7287	
10	Miles N. Clark, Esq. Nevada Bar No. 13848	KOLESAR & LEATHAM	
13	KNEPPER & CLARK LLC	400 S. Rampart Boulevard, Suite 400 Las Vegas, NV 89145	
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	Email: miles.clark@knepperclark.com	Email: morooks@kinevada.com	
15	Zman. mies.etark e kneppererark.eem	Richard J. Reynolds, Esq.	
16	David H. Krieger, Esq.	BURKE, WILLIAMS & SORENSEN, LLP	
16	Nevada Bar No. 9086	1851 East First Street, Suite 1550	
17	HAINES & KRIEGER, LLC	Santa Ana, CA 92705, CA 92705	
	Email: dkrieger@hainesandkrieger.com	Email: rreynolds@bwslaw.com	
18	Counsel for Plaintiff	Counsel for Defendants	
19		Trinity Financial Services, LLC and Trinity Recovery Services, LLC	
20	<u>ORDER</u>	D_	
21	IT IS SO ORDERED.		
22	Dated: August 20, 2018	RICHARD F. BOULWARE, II	
23		United States District Court	
24			
25			
26			
27			

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LA #4820-8068-6192 v1